

Exhibit 1



FW: Valsartan: ZHP Document Production ZHP044

Christopher Geddis <CGeddis@mazieslater.com>

To: [REDACTED]

Fri, Jul 23, 2021 at 10:36 AM

From: Prisela, Jessica <JPrisela@duanemorris.com>

Sent: Friday, July 9, 2021 1:31 PM

To: Christopher Geddis <CGeddis@mazieslater.com>

Cc: Goldberg, Seth A. <SAGGoldberg@duanemorris.com>; Good, Rachel <RMGood@duanemorris.com>; Hill, Coleen W. <CWHill@duanemorris.com>; Adam Slater <ASlater@mazieslater.com>; Cheryl Calderon <calderon@mazieslater.com>; Ihilton@kanner-law.com>; George T. Williamson <gwilliamson@farr.com>; David_Hobbs <david_hobbs@fleming-law.com>

Subject: RE: Valsartan: ZHP Document Production ZHP044

Chris,

As a follow-up to my prior email, below please find the employment information requested by Plaintiffs. As several of these employees have worked for ZHP for more than ten years, determining the date (or, in some cases, the approximate date) each employee first had access to an email account took the client some time to determine.

Full Name	Last Name	First Name	Email Address	Department	Title	Dates of Employment	Date Email Account First Used
林金生	LIN	Jinsheng	linjsheng@huahaipharm.com	CEMAT	Assistant Technical Director	July 2012-Present	August 2012
黄天培	HUANG	Tianpei	huangtianpei@huahaipharm.com	CEMAT	Researcher	July 2016-March 2019	2016 (Approximately)
陈旺伟	CHEN	Wangwei	chenwangwei@huahaipharm.com	Technical Department	Senior Supervisor	July 2011-August 2017	Although he was assigned an email address by the IT department, he was never given access to an email account or a computer
方国军	FANG	Guojun	fanguoguo@huahaipharm.com	Technical Department	Supervisor	April 2015-January 2019	2015 (Approximately)
李丹	LI	Dan	lidan@huahaipharm.com	CEMAT	Technical Supervisor	August 2016-Present	January 2017 (Approximately)
王鹏	WANG	Peng	wangpeng@huahaipharm.com	Production and Operation Center	Deputy General Manager	July 2004-March 2020	2006 (Approximately)
刘鹏	LIU	Peng	liupeng@huahaipharm.com	Technical Department	Technician	July 2015-April 2018	2017 (Approximately)
王伟	WANG	Wei	wangweicn@huahaipharm.com	Product Technology Center	Supervisor	July 2016-Present	November 2017

7/23/2021

Gmail - FW: Valsartan: ZHP Document Production ZHP044

朱文泉	ZHU	Wenquan	zhuwenquan@huaahaipharma.com	Quality Research	Director	July 2006-Present	2007 (Approximately)
陈文斌	CHEN	Wenbin	chenwenbinqr@huaahaipharma.com	Quality Research	Analysis Director	November 2013-Present	November 2013
张文斌	ZHANG	Wenling	zhangwenlin@huaahaipharma.com	Production Department II	Deputy Director	July 2008 - April 2020	2009 (Approximately)
葛菊彩	GE	Jucal	gejucai@huaahaipharma.com	Quality Assurance	API QA Director	July 2000-Present	2014 (Approximately)
李敏	LI	Min	minli@huaahaipharma.com	Analysis and Testing	Vice President	September 2014-Present	September 2014
董鹏	DONG	Peng	dongpeng@huaahaipharma.com	Product Technology Center	Deputy Director	July 2006-Present	2009 (Approximately)
林丽红	LIN	Lihong	lindalin@huaahaipharma.com	Regulatory Affairs	Director	September 1997-Present	2000 (Approximately)
刘燕峰	LIU	Yangfeng	lucyliu@huaahaipharma.com	Regulatory Affairs	Deputy Director & Manager	June 2003-Present	June 2003

Best regards,

Jessica Prisela
Attorney at Law

Duane Morris LLP
30 South 17th Street
Philadelphia, PA 19103-4196
P +1 215 979 1159
F +1 215 827 5486
C: +1 650 224 9097

JPriselac@duanemorris.com
www.duanemorris.com

From: Prisela, Jessica <JPriselac@duanemorris.com>
Sent: Friday, July 9, 2021 11:17 AM
To: Christopher Geddis <CGeddis@mazieslater.com>
Cc: Goldberg, Seth A. <SAGoldberg@duanemorris.com>; Good, Rachel <RMGood@duanemorris.com>; Hill, Coleen W. <CWHill@duanemorris.com>; Adam Slater <ASlater@mazieslater.com>; Cheryl Calderon <calderon@mazieslater.com>; Ihilton@kanner-law.com; George T. Williamson <gwilliamson@farr.com>; David_Hobbs <david_hobbs@fleming-law.com>
Subject: Re: Valsartan: ZHP Document Production ZHP044

Chris,

As initial matter, ZHP produced far fewer than 4,000 documents this week, and you requested the employment info. for the expanded list of custodians just last week. That said, we expect to have the employment information to you this afternoon.

<https://mail.google.com/mail/u/0/?ui=2&ik=4d32c10015&view=lg&permmsgid=msg-f:1706086650168461083>

2/41

7/23/2021

Gmail - FW: Valsartan: ZHP Document Production ZHP044

On the extension, we are happy to agree to your request so long as you agree that we will have until August 13 to respond due to our team's summer vacation schedules.

Thanks,

Jessica Prisela
Attorney at Law

Duane Morris LLP
30 South 17th Street
Philadelphia, PA 19103-4196
P: +1 215 979 1159
F: +1 215 827 5486
C: +1 650 224 9097
JPrisela@duanemorris.com

On Jul 9, 2021, at 11:07 AM, Christopher Geddis <CGeddis@mazieslater.com> wrote:

Hi Jessica,

Please advise if you consent to the below-requested extension.

Thanks,
Chris

From: Christopher Geddis
Sent: Thursday, July 8, 2021 6:23 PM
To: Prisela, Jessica <JPrisela@duanemorris.com>; Good, Rachel <RMGood@duanemorris.com>; Hill, Coleen W. <CWHill@duanemorris.com>; Adam Slater <ASlater@mazieslater.com>;
Cc: 'sgoldberg@duanemorris.com' <sgoldberg@mazieslater.com>; Ihilton@kanner-law.com; George T. Williamson <gwilliamson@farr.com>; David Hobbs <David_Hobbs@fleming-law.com>
Subject: RE: Valsartan: ZHP Document Production ZHP044

Jessica,

ZHP produced over 4,000 pages of documents last night. Based on the custodians, including Jinsheng Lin, this production is part of ZHP's Supplemental Production. Plaintiffs now need to review these documents and update their planned motion to compel, which is currently due tomorrow. As a result, Plaintiffs ask for your consent to a two-week extension on their deadline to file their motion to compel.

7/23/2021

Email - FW: Valsartan: ZHP Document Production ZHP044

Plaintiffs also note that they have not received the dates of employment and ZHP email issuance as well as other relevant employment information, including titles and departments, for: (a) Jinsheng LIN; (b) Tianpei HUANG; (c) Wangwei CHEN; (d) Dan Li; (e) Guojun FANG; (f) Peng LIU; (g) Wei WANG; (h) Wenquan ZHU; (i) Wenbin CHEN; (j) Peng WANG; (k) Wenling ZHANG; (l) Jucai GE; (m) Min Li; (n) Peng DONG; (o) Lihong LIN; and (p) Yanfeng LIU over two weeks ago during our meet and confer, ZHP has still failed to do so. Please provide this information as soon as possible so that Plaintiffs can use it to evaluate ZHP's Supplemental Production.

Best,

Chris

Christopher J. Geddis
Associate Attorney

Mazie Slater Katz & Freeman, LLC

103 Eisenhower Parkway

Roseland, New Jersey 07068

(973) 228-9898

cgeddis@mazieslater.com

www.mazieslater.com

<image001.jpg>

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From: Good, Rachel <RMGood@duanemorris.com>

Sent: Wednesday, July 7, 2021 9:50 PM

To: 'rnonik@golombhoni.com' <rnonik@golombhoni.com>; 'd.stanoch@kanner-law.com' <d.stanoch@kanner-law.com>; Adam Slater <ASlater@mazieslater.com>; 'dnigh@levinlaw.com' <dnigh@levinlaw.com>; 'c.whiteley@kanner-law.com' <c.whiteley@kanner-law.com>

Cc: Behram Parekh <behram.parekh@drilawlp.com>; 'argenal@csdisco.com' <argenal@csdisco.com>; 'valpec@kirtlandpackard.com' <valpec@kirtlandpackard.com>; 'CohenL@gtlaw.com' <CohenL@gtlaw.com>; 'bct@pietragallo.com' <bct@pietragallo.com>; 'Jheinz@c-wlaw.com' <Jheinz@c-wlaw.com>; 'jpoletto@hkmp.com' <jpoletto@hkmp.com>; 'alexia.brancato@kirkland.com' <alexia.brancato@kirkland.com>; Klein, Alan <AKlein@duanemorris.com>; Goldberg, Seth A. <SAGoldberg@duanemorris.com>; Priselac, Jessica <JPriselac@duanemorris.com>; Bazan, Rebecca <REBazan@duanemorris.com>; Hill, Coleen W. <CWHill@duanemorris.com>; 'valsartan@csdisco.com' <valsartan@csdisco.com>; 'robertson@csdisco.com' <robertson@csdisco.com>; Cheryll Calderon <ccalderon@mazieslater.com>; Ashleigh Raso <araso@meshbeshier.com>; Hansen, Forrest <FRHansen@duanemorris.com>

Subject: Valsartan: ZHP Document Production ZHP044

Exhibit 2

MAZIE SLATER KATZ & FREEMAN, LLC

103 Eisenhower Parkway, Suite 207, Roseland, NJ 07068

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www.mazieslater.com

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Julia S. Slater°

°Member of N.J. & N.Y. Bars

July 19, 2021

VIA EMAILSAGoldberg@duanemorris.com

Seth A. Goldberg, Esq.

Duane Morris LLP

30 South 17th Street

Philadelphia, Pennsylvania 19103-4196

RE: *In re Valsartan, Losartan, and Irbesartan Products Liability Litigation,*
No. 1:19-md-02875

Dear Counsel:

We are writing to follow up on Plaintiffs' July 13, 2021 letter requesting confirmation that ZHP produced Baohua Chen's complete custodial file on July 12, 2021, and requesting the immediate production of Xiaofang (Maggie) Kong's custodial file. To date you have not responded and have not produced Maggie Kong's custodial file.

Baohua Chen's custodial file appears to be demonstrably incomplete. Plaintiffs note that the file contains only 326 documents. Only 15 of those documents predate ZHP's recall of its contaminated valsartan. Despite signing the 2010 contract on behalf of Shanghai Syncores to develop the ZnCl₂ process, and having extensive input into numerous issues including for example pricing, market share, and other issues, **the earliest document in his custodial file is a January 24, 2018 email.**

Seth A. Goldberg, Esq.
Duane Morris LLP
July 19, 2021
Page 2

ZHP has previously produced approximately 32 emails involving Mr. Chen from 2010, 12 from 2011, 4 from 2012, 3 from 2013, 14 from 2014, 4 from 2015, 7 from 2016, and 55 from 2017. Yet, none of these emails are in the custodial file that you produced on July 12, 2021, nor is he listed as a duplicative custodian on any of them. In fact, the July 12, 2021 production has a mere 161 documents containing Mr. Chen's email address.

Plaintiffs intend to raise these issues with the Court at the next case management conference if they cannot be resolved.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Adam M. Slater", with a long horizontal stroke extending to the right.

ADAM M. SLATER

Exhibits 4-19

ZHP has designated Exhibits 4 through 19 as confidential. Plaintiffs hereby challenge these designations. In accordance with the Court's Confidentiality and Protective order, Plaintiffs will forward the Exhibits to the Court directly via email for its in camera review.

Exhibit 20

Confidential Information - Subject to Protective Order

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF NEW JERSEY
3 CAMDEN VICINAGE

4 *****

5 IN RE: VALSARTAN, LOSARTAN, MDL No. 2875
6 AND IRBESARTAN PRODUCTS
7 LIABILITY LITIGATION Civil No.
8 19-2875
9 ***** (RBK/JS)

10 THIS DOCUMENT APPLIES TO ALL HON ROBERT B.
11 CASES KUGLER

12 *****

13 - CONFIDENTIAL INFORMATION -
14 SUBJECT TO PROTECTIVE ORDER

15

16

17 Remote Videotaped via Zoom
18 Deposition of MIN LI, Ph.D., commencing at 7:03
19 a.m. China Standard Time, on the 20th of
20 April, 2021, before Maureen O'Connor Pollard,
21 Registered Diplomat Reporter, Realtime
22 Systems Administrator, Certified Shorthand
23 Reporter.

24

23 GOLKOW LITIGATION SERVICES
24 877.370.3377 ph | 917.591.5672 fax
deps@golkow.com

1 relate to work and for personal?

2 A. No, no. Mostly personally.

3 Q. Did you ever send text messages
4 on your Samsung phone that you still have
5 related to work?

6 A. No.

7 Q. Not once?

8 A. No.

9 Q. Did you ever send text messages
10 on any other phone related to work?

11 A. No. I don't like, you know,
12 text messages.

13 Q. Well, you had three different
14 phones for work purposes. Did you ever send
15 text messages related to work on any of those
16 three phones?

17 A. No.

18 Q. Do you know if those phones, if
19 any of your -- rephrase.

20 Do you know if any of your
21 phones were taken by your company so that the
22 information on the phones could be downloaded
23 and then reviewed for production to us as
24 part of the litigation? Did they take your

1 phone or phones?

2 A. Did they take my phones. I
3 don't think so. I don't remember. I don't
4 remember if they did that.

5 Q. Did anybody ever tell you at
6 any point that you needed to save your
7 documents and information and not delete
8 anything because of this litigation?

9 A. Oh, yes, mm-hmm.

10 Q. When was that?

11 A. The very first time, it must be
12 two, three years ago, I think.

13 Q. How did you --

14 A. But again --

15 Q. Was it someone who spoke to
16 you, or did you get something in writing?

17 A. Somebody sending through the
18 e-mail. Yeah, I think it should be someone,
19 you know, of, you know, Maggie Kong's staff,
20 you know, one of her staff.

21 Q. Do you ever use WeChat?

22 A. Yes.

23 Q. How long have you been using
24 WeChat?

Exhibit 21

Confidential Information - Subject to Protective Order

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF NEW JERSEY
3 CAMDEN VICINAGE

- - -

4 IN RE: VALSARTAN, : MDL NO. 2875
5 LOSARTAN, AND :
6 IRBESARTAN PRODUCTS : CIVIL NO.
7 LIABILITY LITIGATION : 19-2875
8 : (RBK/JS)

9 :
10 THIS DOCUMENT APPLIES : HON. ROBERT
11 TO ALL CASES : B. KUGLER
12 - CONFIDENTIAL INFORMATION -
13 SUBJECT TO PROTECTIVE ORDER

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- - -

May 27, 2021

- - -

14 Videotaped remote deposition of
15 JUN DU, taken pursuant to notice, was
16 held via Zoom Videoconference, beginning
17 at 9:16 a.m., EST, on the above date,
18 before Michelle L. Gray, a Registered
19 Professional Reporter, Certified
20 Shorthand Reporter, Certified Realtime
21 Reporter, and Notary Public.

- - -

22 :
23 :
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32 :
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34 :

1 A. That is correct.

2 Q. Do you have a smartphone
3 that you use for work?

4 A. That is correct.

5 Q. What type?

6 A. It's an iPhone Model 8.

7 Q. How long have you had that?

8 A. I do not recall how long I
9 been using it. I believe I started in
10 2016 also.

11 Q. Was that iPhone provided to
12 the third party vendor to pull off
13 documents or information for us?

14 A. No.

15 Q. Did anybody ask you for it
16 from work -- rephrase.

17 Did any attorneys or --
18 rephrase.

19 Did anybody ask you for the
20 iPhone so that it could be evaluated so
21 documents and information could be
22 provided to us?

23 A. No.

24 MR. SLATER: I don't know

Exhibit 22

Confidential Information - Subject to Protective Order

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF NEW JERSEY
3 CAMDEN VICINAGE

4 *****
5 IN RE: VALSARTAN, LOSARTAN, MDL No. 2875
6 AND IRBESARTAN PRODUCTS

7 LIABILITY LITIGATION Civil No.
8 19-2875

9 ***** (RBK/JS)

10 THIS DOCUMENT APPLIES TO ALL

11 CASES HON ROBERT B.
12 KUGLER

13 *****

14 - CONFIDENTIAL INFORMATION -
15 SUBJECT TO PROTECTIVE ORDER

16

17

18

19 Remote Videotaped via Zoom
20 Deposition of YUELIN HU, commencing at 7:04
21 a.m. China Standard Time, on the 12th of May,
22 2021, before Maureen O'Connor Pollard,
23 Registered Diplomat Reporter, Realtime
24 Systems Administrator, Certified Shorthand
25 Reporter.

26

27

28

29 GOLKOW LITIGATION SERVICES
30 877.370.3377 ph | 917.591.5672 fax
31 deps@golkow.com

32

33

1 litigation.

2 Q. How about your personal cell
3 phone, was that ever taken?

4 A. My personal cell phone is a
5 personal device. I don't use it for work,
6 and it's unrelated to the valsartan case. It
7 is a personal item.

8 Q. I understand that. But your
9 earlier testimony was that you have used your
10 personal cell phone in the past to send
11 e-mails and make phone calls for work
12 purposes.

13 Do you remember that?

14 MR. BALL: Objection.

15 Mischaracterizes the testimony.

16 A. In the past I did occasionally
17 use my cell phone to view e-mails, but it was
18 viewing only. These e-mails were also on my
19 computer. They were not saved -- relevant
20 information was not saved in my cell phone.

21 BY MR. WILLIAMSON:

22 Q. Do you have a personal e-mail
23 address?

24 A. Not right now.

Exhibit 23

Confidential Information - Subject to Protective Order

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF NEW JERSEY
3 CAMDEN VICINAGE

4 *****
5 IN RE: VALSARTAN, LOSARTAN, MDL No. 2875
6 AND IRBESARTAN PRODUCTS

7 LIABILITY LITIGATION Civil No.
8 19-2875

9 ***** (RBK/JS)

10 THIS DOCUMENT APPLIES TO ALL
11 CASES HON ROBERT B.
12 KUGLER

13 *****
14 - CONFIDENTIAL INFORMATION -
15 SUBJECT TO PROTECTIVE ORDER

16 Remote Videotaped via Zoom
17 Deposition of JIE WANG, commencing at 7:01
18 a.m. China Standard Time, on the 18th of May,
19 2021, before Maureen O'Connor Pollard,
20 Registered Diplomat Reporter, Realtime
21 Systems Administrator, Certified Shorthand
22 Reporter.

23 - - -
24

25 GOLKOW LITIGATION SERVICES
26 877.370.3377 ph | 917.591.5672 fax
27 deps@golkow.com

1 personal e-mail address?

2 A. No, I don't think so.

3 Q. When your company collected
4 your documents -- rephrase.

5 When your company collected
6 your computer, do you know whether your
7 personal e-mail was searched for relevant
8 documents?

9 A. I don't know.

10 Q. Okay. Did anyone ever ask you
11 for you to search your personal e-mail to see
12 if you had personal e-mails or other
13 documents that might be relevant to this
14 litigation?

15 A. I do not remember currently,
16 but it could be mentioned that I took a look
17 at my personal e-mails.

18 Q. When you say "it could be
19 mentioned," what do you mean?

20 A. Some of my colleagues with IT
21 department, they are the department who was
22 coordinating the collection of laptops and
23 some related topics.

24 Q. Did anyone ever ask for your

Exhibit 24

Confidential Information - Subject to Protective Order

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF NEW JERSEY

2

3 *****

MDL No. 2875

4 IN RE: VALSARTAN, LOSARTAN,
AND IRBESARTAN PRODUCTS HON ROBERT B.
5 LIABILITY LITIGATION KUGLER

6 *****

7 THIS DOCUMENT APPLIES TO ALL
8 CASES

8

9 - CONFIDENTIAL INFORMATION -
SUBJECT TO PROTECTIVE ORDER

10

11 Remote Videotaped via Zoom
12 Deposition of HAI WANG, commencing at 9:03
13 a.m., on the 10th of March, 2021, before
14 Maureen O'Connor Pollard, Registered
15 Diplomat Reporter, Realtime Systems
16 Administrator, Certified Shorthand Reporter.

17

18 - - -

19

GOLKOW LITIGATION SERVICES
20 877.370.3377 ph | 917.591.5672 fax
deps@golkow.com

21

22

23

24

1 A. I have used the iPhone now,
2 I'm -- I've been using the iPhone now.
3 Previously I have used one of the android
4 phone.

5 Q. How long have you been using an
6 iPhone?

7 A. I don't remember exactly, but
8 somewhere around 2014, 2015ish.

9 Q. Was that phone -- was that
10 phone collected as well so that it could be
11 also searched for production of documents?

12 MR. GOLDBERG: Objection to
13 form.

14 A. I do not believe so.

15 BY MR. SLATER:

16 Q. In addition to your work
17 e-mail, do you ever use other e-mail
18 addresses for work-related e-mailing?

19 A. I have personal e-mail account,
20 but conducting my personal businesses, not
21 for the work.

22 Q. Have you ever used your
23 personal e-mail between 2014 and the present
24 for business purposes, even one time?

Exhibit 25

2

3 IN RE: VALSARTAN, : MDL NO. 2875
 LOSARTAN, AND :
 4 IRBESARTAN PRODUCTS : HON. ROBERT
 LIABILITY LITIGATION : B. KUGLER

5 _____

6 THIS DOCUMENT APPLIES
TO ALL CASES

7

- CONFIDENTIAL INFORMATION -
SUBJECT TO PROTECTIVE ORDER

8

9

10 January 26, 2021

11

12

13 Videotaped remote deposition of
LIJIE WANG, Ph.D., taken pursuant to
14 notice, was held via Zoom
Videoconference, beginning at 9:18 a.m.,
15 EST, on the above date, before Michelle
L. Gray, a Registered Professional
16 Reporter, Certified Shorthand Reporter,
Certified Realtime Reporter, and Notary
17 Public.

18

	January	February	March
1. Total number of cases	10	15	20
2. Number of cases with symptoms	8	12	18
3. Number of cases with fever	6	10	15
4. Number of cases with cough	7	11	16
5. Number of cases with fatigue	5	9	14
6. Number of cases with loss of taste	4	8	12
7. Number of cases with loss of smell	3	7	10
8. Number of cases with chest pain	2	5	8
9. Number of cases with shortness of breath	1	4	6
10. Number of cases with hospitalization	0	2	4
11. Number of cases with death	0	1	2
12. Number of cases with recovery	10	15	20

19

20 GOLKOW LITIGATION SERVICES
877.370.3377 ph | 917.591.5672 fax
21 deps@golkow.com

21

22

23

24

1 don't use my cell phone for
2 documentation.

3 BY MR. SLATER:

4 Q. I'm just asking if you know
5 if your -- was your -- rephrase.

6 Was your iPhone given to
7 anybody so that it could be checked for
8 information that needed to be produced?
9 Was that done?

10 MS. PRISELAC: Objection to
11 form.

12 THE WITNESS: I don't
13 remember this.

14 BY MR. SLATER:

15 Q. Did you prepare for this
16 deposition?

17 A. Yes. I prepared.

18 Q. Okay. Did you prepare with
19 lawyers?

20 A. Yes, I did prepare with the
21 lawyers.

22 Q. Which lawyers did you
23 prepare with?

24 A. I prepared with Jessica.

Exhibit 26

Confidential Information - Subject to Protective Order

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF NEW JERSEY
3 CAMDEN VICINAGE

4 *****
5 IN RE: VALSARTAN, LOSARTAN, MDL No. 2875
6 AND IRBESARTAN PRODUCTS

7 LIABILITY LITIGATION Civil No.
8 19-2875

9 ***** (RBK/JS)

10 THIS DOCUMENT APPLIES TO ALL

11 CASES HON ROBERT B.
12 KUGLER

13 *****

14 - CONFIDENTIAL INFORMATION -
15 SUBJECT TO PROTECTIVE ORDER

16
17 VIDEOTAPED DEPOSITION OF XIAODI GUO
18 MAY 20, 2021
19 VOLUME I

20 Remote Videotaped via Zoom Deposition
21 of XIAODI GUO, commencing at 7:00 a.m. China Standard
22 Time, on the 20th of May, 2021, before Juliana F.
23 Zajicek, Registered Professional Reporter, Certified
24 Shorthand Reporter and Certified Realtime Reporter.

 - - -

 GOLKOW LITIGATION SERVICES
 877.370.3377 ph | 917.591.5672 fax
 deps@golkow.com

Confidential Information - Subject to Protective Order

1 know if that iPhone was ever provided to the company
2 so they could collect information for purposes of
3 producing it in this litigation?

4 A. If -- I forgot what the details. But
5 whatever they ask for, I provided.

6 Q. Right. Did -- did they ask for the
7 iPhone?

8 A. I forgot if they ask for the iPhone or
9 not.

10 Q. Okay. So you, just sitting here today,
11 you can't tell me whether you provided your cell phone
12 to anyone to collect data on?

13 MS. HILL: Objection. Asked and answered.

14 BY THE WITNESS:

15 A. Okay. Yeah, I think I forgot if the
16 iPhone be involved or not, but obviously I can
17 cooperate whatever requirements.

18 BY MR. HOBBS:

19 Q. I'm sorry. I'm not sure -- I'm not sure I
20 understood that last part.

21 What did you just say?

22 A. The iPhone is just e-mail sometimes goes
23 through it.

24 Q. Okay.

Exhibit 27

1 could answer.

2 Go ahead, John.

3 THE WITNESS: In regards to
4 the documentation preservation,
5 you know, not to delete any
6 comments on any of the e-mails,
7 any of the paper documents, any
8 trailing information. Mainly
9 keeping all information as it's on
10 my computer, my laptop, all the
11 areas of electronic devices.

12 BY MR. SLATER:

13 Q. In terms of the work that
14 you do at your company and have done
15 since you've been there, which electronic
16 devices have you used over the years?
17 Meaning, do you have a computer in your
18 office? Do you have a laptop? Do you
19 have a handheld smartphone that you'd
20 use?

21 And what I'm getting at with
22 that is to your knowledge, were those all
23 searched and were they all subject to
24 document and information preservation for

1 the litigation hold?

2 A. I have a laptop, yes. I've
3 always used a laptop. My laptop
4 information was taken, yes.

5 Q. Have you always used the
6 same laptop?

7 A. No. They die after a few
8 years.

9 Q. What did you -- rephrase.
10 Your current laptop, does
11 that have all the data and information
12 from the prior laptops, meaning when you
13 switched, would the information be
14 brought forward?

15 A. Sure, yes.

16 MR. SLATER: That is all the
17 questions I have for now.

18 I don't know if your counsel
19 is going to ask any questions. If
20 she does, I would likely follow
21 up.

22 But for now, I'm done.

23 Thank you.

24 THE WITNESS: Thank you.

Exhibit 28

ZHP has designated Exhibit 28 as confidential. Plaintiffs hereby challenge this designation. In accordance with the Court's Confidentiality and Protective order, Plaintiffs will forward the Exhibit to the Court directly via email for its in camera review.

Exhibit 29

Litigation Notices Issued by ZHP Parties as of December 30, 2019

Name	Notice sent on behalf of Jun Du on September 13, 2018	Notice sent on behalf of Jun Du on September 13, 2018	Notice sent on behalf of Jun Du on March 6, 2019	Notice sent on behalf of Jun Du on March 7, 2019	Notice sent on behalf of Jun Du on November 19, 2019	Notice sent on behalf of Jun Du on November 20, 2019	Notice sent on behalf of Jun Du on November 27, 2019	Notice sent on behalf of Jun Du on December 11, 2019	Notice sent on behalf of Jun Du on December 19, 2019	Notice sent on behalf of Jun Du on December 20, 2019	Notice sent on behalf of Jun Du on December 21, 2019
An, Jianguo									X		
Arbab, Noor	X										
Arnold, Matthew	X		X								
Ayres, David	X		X		X		X				
Bao, Chaochua											
Bill, Jr., Jon M.					X						
Cai, Ping (Dan)						X					
Chen, Baozhen		X		X		X					
Chen, Boahua						X					
Chen, Q. M.		X		X					X		
Chen, Wei						X					
Chen, Wenbin		X		X		X					
Chen, Xiang							X				
Chen, Y. F.						X					
Chen, Yingzhi						X					
Chen, Yong									X		
Chen, Yuanyan						X					
Chen, Yuping						X					
Cheng, Jie									X		
Cheng, Wei						X					
Dong, Peng		X		X		X					
Du, Jun	X		X		X						
Fang, Yuling	X		X						X		
Farrell, Doug	X		X		X						
Gao, Xiaojun						X					
Ge, Jucai		X		X		X					
Gelineau, Hillary	X		X		X						
Gergis, Remonda	X		X		X						

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Groenewoud, Pieter					X						
Gu, Eric		X		X		X					
Gu, Ziqiang						X					
Guo, Xiaodi	X		X		X						
Han, Fang				X							X
Han, Yang							X				
He, Xin					X						
He, Y. Y.							X				
Hu, Min							X				
Hu, Ping									X		
Hu, Wenping						X					
Hu, Yuelin		X		X		X					
Hu, Zhicheng							X				
Huang, Luning									X		
Iozzia, John	X		X		X						
Jia, Zhengjun						X					
Jin, Yongjun						X					
Jin, Yun						X					
Jing, Jin						X					
Kaufman, Ron	X		X		X						
Keith, Chris	X		X		X						
Kong, Xiaofang (Maggie)	X		X		X						
Kuang, Xiaxia									X		
Kuo, Shengchung	X										
Li, Hongchao						X					
Li, J. Y.						X					
Li, Min		X		X		X					
Li, Na									X		

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Li, Qiangming		X		X		X					
Li, Qing							X				
Li, Xiaoling						X					
Li, Yaohan (Isabel)	X		X		X						
Liang, Zunjun		X		X			X				
Lin, Jie							X				
Lin, Linda	X	X	X	X		X					
Lin, Ling									X		
Lin, Mudan							X				
Liu, Nelson	X		X		X						
Liu, Taofang							X				
Liu, Tiyun							X				
Liu, X. G.						X					
Liu, Xiaoming		X		X		X					
Liu, Yanfeng (Lucy)						X					
Luo, Guangyu	X		X		X						
Meng, Yanhua (Anne)		X		X			X				
Min, Jin		X		X					X		
Min, Zeqi									X		
Pajooli, Ken	X		X		X						
Ping, Huling		X		X					X		
Qiao, Gavin	X				X						
Qiu, Hongchun			X		X						
Qiu, Jane					X						
Shang, Fei				X		X					
Shang, Peng					X						
Sun, Dengxue							X				
Tan, Li							X				

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Tang, Fengyang							X				
Tang, Yiming	X		X		X						
Tao, Juan						X					
Tian, Yun						X	X				
Tong, Nan											
Tong, Zengyuan						X	X				
Tsai, Ph.D., Wen-Chien (Eric)	X		X		X						
Wang, Dongqin					X	X					
Wang, Hai	X		X				X				
Wang, Haiqin											
Wang, Hui									X		
Wang, Jian		X		X							
Wang, Jie (Legal)		X		X							X
Wang, Jie (Sales)						X				X	
Wang, Jun											
Wang, Lijie	X		X		X						
Wang, Lina							X				
Wang, Lingfang											
Wang, Ma	X		X						X		
Wang, Minfa	X		X		X				X		
Wang, Peng		X		X		X					
Wang, Youhu					X	X					
Wang, Yuehua							X				
Wang, Yuhua							X				
Wen, Ping							X				
Wu, Lina						X					
Wu, Tina	X				X						
Xi, Lily	X		X		X						

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Xiang, Jn		X		X					X		
Xianyi, Xu	X	X	X	X					X		
Xie, Chongjun						X					
Xie, Mengmeng							X				
Xie, Yuanyuan					X						
Xiong, Sophie			X								
Xiong, Ying		X				X					
Xu, Baoxia						X	X				
Xu, Mi						X					
Xu, Min									X		
Xu, Pijie		X		X	X						
Xu, Weiwei					X						
Yan, Fengfeng							X				
Yang, Chun							X				
Yang, Yang									X		
Ye, Cunxiao (Jenson)		X									
Ye, Jian							X				
Ye, Tree	X										
Ying, Chen	X		X		X						
Yu, Xiao							X				
Yu, Zhongshui	X		X		X						
Zeng, Guang							X				
Zhang, Danyang									X		
Zhang, Fuyu									X		
Zhang, Kathy	X		X		X						
Zhang, Mei		X		X					X		
Zhang, Minli		X		X		X					
Zhang, Pei			X								X

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Zhang, Renguo		X		X							X
Zhang, Shiwen		X		X							
Zhang, Tian						X					
Zhang, Wenling		X				X					
Zhang, Xianhua						X					
Zhang, Xianliang							X				
Zhao, Caifeng						X					
Zhao, David (Dachuan)	X		X								
Zhao, Jianzhi								X			
Zhao, Louis										X	
Zhao, Xiaohong				X		X					
Zhao, Yueding						X					
Zheng, Gaozhe						X					
Zheng, Meng								X			
Zheng, Youqing						X					
Zhong, Feng (Vicky)						X					
Zhong, Sheng						X					
Zhou, Huoming						X	X				
Zhou, Qiang						X					
Zhou, Sandy	X		X		X						
Zhou, Ting (Ada)				X		X					
Zhou, Xiaohui							X				
Zhou, Yong		X		X		X					
Zhu, Jenny		X		X					X		
Zhu, Kaiwei									X		
Zhu, Lesley	X		X		X						
Zhu, Wenquan		X		X		X					
Zhu, Xiaoren						X					

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Zhu, Yan		X		X					X		
Zhu, Yonghua		X		X							X

Exhibit 30

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE

IN RE: VALSARTAN, LOSARTAN, AND
IRBESARTAN PRODUCTS LIABILITY
LITIGATION

This document relates to:
All Actions

MDL No. 19-2875 (RBK/KW)

[PROPOSED] SPECIAL MASTER ORDER NO. ____

Having reviewed Plaintiffs' motion to compel ZHP's Supplemental
Production as well as Defendants' opposition,

It is hereby ORDERED this ____ day of August, 2021 that Plaintiffs' request
is **GRANTED**. Within five days of the date of this order, ZHP must produce the
complete custodial files for Baohua Chen, Xiaofang (Maggie) Kong, Jinsheng Lin,
Tianpei Huang, Wangwei Chen, Dan Li, Guojon Fang, Peng Liu, Wei Wang,
Wenquan Zhu, Wenbin Chen, Peng Wang, Wenling Zhang, Jucai Ge, Min Li, Peng
Dong, Lihong Lin, and Yanfeng Liu, all in compliance with the Court's ESI
protocol. Within the same amount of time, ZHP must produce (1) all documents
related to the "TC-201729" investigation and any investigation or study that
formed the basis for Jinsheng Lin's July 27, 2017 email, (2) the documents and/or
information necessary for Plaintiffs to determine what happened to the cell phones

and/or laptop computers for Eric Gu and Min Li, including the date of occurrence and when and how the device was replaced, and location and status of the broken device, (3) any additional responsive and non-privileged emails, meeting minutes, and calendar invites related to the meetings Min Li attended with Baohua Chen concerning the discovery of NDMA in ZHP sartans and the QC department meetings organized or attended by Qiangming Li, (4) any additional responsive and non-privileged documents relating to the batch testing referenced in PRINSTON0075797, including results for EDMF, CP, and USP grade valsartan, (5) records and documentation associated with Min Li's meeting with 'multi-national companies' where the decision was made by ZHP to limit its investigation of unknown peaks smaller than 20, (6) all of its litigation hold letters and its complete document retention policies, including complete production of all final versions of the standard management or operating procedures which discuss or detail document retention.

Hon. Thomas I. Vanaskie (Ret.)
Special Master